

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Olena Havryshchuk) Chapter 7
)
) No. 22-13057
)
Debtor(s)) Judge David D. Cleary

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on March 15, 2023, at 10:00am, I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, **either** in courtroom 644 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of Debtor [to/for] Employ Attorney, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 122 6457, and the passcode is Cleary644. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: David Freydin

Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, Illinois 60077
847.972.6157

CERTIFICATE OF SERVICE

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on February 21, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

CERTIFICATE OF SERVICE

I hereby certify that in this 21st day of February, 2023, I placed a true and correct copy of the foregoing DEBTOR'S MOTION TO EMPLOY ATTORNEY., in the U.S. Mail, first-class, postage prepaid, addressed to the following parties:

Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 S. Dearborn St.
Room 873
Chicago, IL 60604

David P. Leibowitz
Law Offices of David P. Leibowitz LLC
3478 N. Broadway, Ste Unit 207
Chicago, IL 60657-2516

Service List

/s/ David Freydin
David Freydin

Label Matrix for local noticing
0752-1
Case 22-13057
Northern District of Illinois
Eastern Division
Tue Feb 21 09:55:45 CST 2023

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

AES/Education Loans
Attn: Bankruptcy
Po Box 2
Harrisburg, PA 17105

Amex/Bankruptcy
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Barclays Bank Delaware
Attn: Bankruptcy
Po Box 8801
Wilmington, DE 19899-8801

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capitalone
Attn: Bankruptcy
Po Box 30258
Salt Lake City, UT 84130-0258

Cavalry Portfolio Services
Attn: Bankruptcy
500 Summit Lake Drive, Suite 400
Vahalla, NY 10595-2321

Discover Financial
Attn: Bankruptcy
Po Box 3025
New Albany, OH 43054-3025

Fifth Third Bank
Attn: Bankruptcy
Maildrop RCSB3E 1830 E Paris Ave SE
Grand Rapids, MI 49546

Kohls/Capital One
Attn: Credit Administrator
Po Box 3043
Milwaukee, WI 53201-3043

Merrick Bank/CardWorks
Attn: Bankruptcy
Po Box 9201
Old Bethpage, NY 11804-9001

Midland Fund
Attn: Bankruptcy
350 Camino De La Reine, Suite 100
San Diego, CA 92108-3007

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Resurgent Capital Services
Attn: Bankruptcy
Po Box 10497
Greenville, SC 29603-0497

(p)SPRING OAKS CAPITAL LLC
1400 CROSSWAYS BLVD STE 100B
CHESAPEAKE VA 23320-0207

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Target
c/o Financial & Retail Services
Mailstop BT PO Box 9475
Minneapolis, MN 55440-9475

The Bureaus Inc
Attn: Bankruptcy
650 Dundee Rd, Ste 370
Northbrook, IL 60062-2757

David Freydin
Law Offices of David Freydin Ltd
8707 Skokie Blvd
Suite 312
Skokie, IL 60077-2281

David P Leibowitz ESQ
Law Offices of David P Leibowitz LLC
3478 N. Broadway
Ste Unit 207
Chicago, IL 60657-3156

Olena Havryshchuk
9248 Jill Lane, Apt. 2N
Schiller Park, IL 60176-2233

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Bank of America
Attn: Bankruptcy
Po Box 982234
El Paso, TX 79998

Portfolio Recovery Associates, LLC
120 Corporate Blvd Ste 100
Norfolk, VA 23502

(d)Portfolio Recovery Associates, LLC
Attn: Bankruptcy
120 Corporate Boulevard
Norfolk, VA 23502

Spring Oaks Capital, Llc
Attn: Bankruptcy
P.O. Box 1216
Chesapeake, VA 23327

End of Label Matrix
Mailable recipients 24
Bypassed recipients 0
Total 24

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	
)	CASE NO. 22-13057
)	
Olena Havryshchuk)	HON. David D. Cleary
)	
)	CHAPTER 7
DEBTOR.)	

DEBTOR'S MOTION TO EMPLOY ATTORNEY

NOW COMES Olena Havryshchuk, Debtor, by and through Debtor's attorney, David Freydin, and moves this Honorable Court to allow Debtor to employ an attorney to prosecute a hardship adversary to discharge her student loans, and in support thereof states as follows:

1. That the Debtor filed a petition for relief pursuant to Chapter 7 Title U.S.C. on November 10, 2022.
2. That Debtor disclosed her student loans owed to the United States Department of Education on her original petition.
3. That Debtor would like permission to retain David Freydin and the Law Offices of David Freydin to represent her in an adversary proceeding to discharge her student loans under the new guidance issued in November 2022.
4. That David Freydin and his office have considerable experience prosecuting and successfully resolving various types of adversary proceedings.
5. That without counsel, Debtor is not able to properly prosecute a hardship adversary.
6. That pursuant to §327 (e) of the United States Bankruptcy Code, the Debtor respectfully requests that this Honorable Court enter an order authorizing the employment of David Freydin of the Law Offices of David Freydin, an attorney

duly authorized to practice law, to perform all legal services necessary to resolve Debtor's student loan adversary matters.

7. That David Freydin or his office will appropriately request and disclose any compensation for adversary proceedings from this Honorable Court.

WHEREFORE, Debtor, prays this Honorable Court for the following relief:

- A. That this Honorable Court authorize Debtor to employ David Freydin of the Law Offices of David Freydin as attorney to perform all legal services necessary or required in the matter of Olena Havryshchuk.
- B. For such other and further relief this court deems just and proper

Respectfully Submitted,

/s/ David Freydin
Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, IL 60077
847.972.6157